

Dennis Stewart, CA Bar No. 99152
GUSTAFSON GLUEK PLLC
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 595-3299

Daniel E. Gustafson, MN Bar No. 202241
Amanda M. Williams, MN Bar No. 0341691
Matthew Jacobs, MN Bar No. 403465
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844

Darryl J. Horowitz, CA Bar No. 100898
COLEMAN & HOROWITT, LLP
499 West Shaw, Suite 116
Fresno, CA 93704
Telephone: (559) 248-4820

Robert J. Gralewski, Jr., CA Bar No. 196410
Marko Radisavljevic, CA Bar No. 306552
KIRBY McINERNEY LLP
1420 Kettner Boulevard, Suite 100
San Diego, CA 92101
Telephone: (858) 834-2044

Leonard B. Simon, CA Bar No. 58310
THE LAW OFFICES OF LEONARD B. SIMON P.C.
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: (619) 818-0644

Michael Lieberman, DC Bar No. 1033827
Jamie Crooks, CA Bar No. 310447
Yinka Onayemi, NY Bar No. 5940614
FAIRMARK PARTNERS, LLP
1001 G Street NW, Suite 400E
Washington, DC 20001
Telephone: (818) 585-2903

*Attorneys for Plaintiffs Shannon Ray, Khala Taylor,
Peter Robinson, Katherine Sebbane, and Rudy Barajas
Individually and on Behalf of All Those Similarly Situated*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SHANNON RAY, KHALA TAYLOR, PETER
ROBINSON, KATHERINE SEBBANE, and
RUDY BARAJAS Individually and on Behalf of
All Those Similarly Situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated association,

Defendant.

Case No. 1:23-cv-00425

**PLAINTIFFS' NOTICE OF REQUEST
TO SEAL DOCUMENTS**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor
Date: March 3, 2025
Time: 1:30 PM

TO DEFENDANT AND ITS ATTORNEYS OF RECORD AND TO THE UNITED STATES
DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA:

Pursuant to Local Rule 141, please take notice that on November 7, 2024, Plaintiffs Shannon Ray, Khala Taylor, Peter Robinson, Katherine Sebbane, and Rudy Barajas (“Plaintiffs”) submitted the following documents by electronic mail United States District Judge William B. Shubb and served by electronic mail the following documents on all Defendants:

1. Corrected Exhibit 1 (Expert Report of Orley Ashenfelter) to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;
2. Exhibit 2 to Plaintiffs’ Notice of Errata Re: Expert Report of Orley Ashenfelter;
3. Plaintiff’s Request to Seal; and
4. [Proposed] Order Granting Plaintiff’s Request to Seal.

Plaintiffs’ Request to Seal is made pursuant to Local Rule 141(b) and is based upon this Request, all pleadings, papers, and records on file in this action, and any oral argument presented to the Court. The Court may issue orders limiting disclosures of confidential information where compelling reasons exist. *See Pintos v. Pac. Creditors Ass’n*, 605 F.3d 665, 677-78 (9th Cir. 2010); *Felix v. Davis Moreno Constr., Inc.*, No. 07 Civ. 0533, 2008 WL 3009867, at *1-2 (E.D. Cal. Aug. 1, 2008); E.D. Cal. L.R. 141. Plaintiffs make this request as required by the Stipulated Protective Order (ECF No. 56) because Plaintiffs’ Notice of Motion and Motion for Class Certification and particular exhibits to the supporting Declaration of Michael Lieberman contain information designated “CONFIDENTIAL” or “ATTORNEYS’ EYES ONLY” pursuant to the Stipulated Protective Order in this case.

Concurrent with the submission of this Request, Plaintiffs have filed versions of the above documents through the Court’s CM/ECF system that contain redactions of information or materials that have been designated as Confidential or Attorneys’ Eyes Only.

DATED: November 7, 2024

Respectfully submitted,

GUSTAFSON GLUEK PLLC

By: /s/ Dennis Stewart

Dennis Stewart, CA Bar No. 99152
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 595-3299
dstewart@gustafsongluek.com

Daniel E. Gustafson, MN Bar No. 202241

(*pro hac vice*)

Amanda M. Williams, MN Bar No. 0341691

(*pro hac vice*)

Matthew Jacobs, MN Bar No. 403465

(*pro hac vice*)

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120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
dgustafson@gustafsongluek.com
jrissman@gustafsongluek.com
awilliams@gustafsongluek.com

By: /s/ Michael Lieberman

Michael Lieberman, DC Bar No. 1033827

(*pro hac vice*)

Jamie Crooks, CA Bar No. 310447

(*pro hac vice*)

Yinka Onayemi, NY Bar No. 5940614

(*pro hac vice*)

FAIRMARK PARTNERS, LLP

1001 G Street NW, Suite 400 East
Washington, DC 20001
Telephone: (818) 585-2903
michael@fairmarklaw.com
jamie@fairmarklaw.com
yinka@fairmarklaw.com

By: /s/ Robert J. Gralewski, Jr.

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1420 Kettner Boulevard, Suite 100
San Diego, CA 92101
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bgralewski@kmlp.com
mradisavljevic@kmlp.com

Darryl J. Horowitz, CA Bar No. 100898
COLEMAN & HOROWITT, LLP
499 West Shaw, Suite 116
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Telephone: (559) 248-4820
dhorowitz@ch-law.com

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SIMON P.C.**
655 West Broadway, Suite 1900
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Telephone: (619) 818-0644
lens@rgrdlaw.com

Attorneys for Plaintiffs and the Class